

UNITED STATES DISTRICT COURT
DISTRICT COURT OF SOUTH CAROLINA
CHARLESTON DIVISION

Denny Densmore,
PLAINTIFF,

v.

NATIONAL BOARD OF
MEDICAL EXAMINERS,
DEFENDANT.

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CAUSE NO. 2:14-CV-02082-MBS

Motion for Two Week Extension to File Certificate

To the Honorable Margaret B. Seymour:

Palmer Freeman on behalf of Vincent E. Nowak, counsel for Plaintiff, requests an additional two weeks to file his certificate from the Texas Supreme Court for the following reasons.

1. Prior to filing, Nowak consulted with Defense Counsel about this Motion for Two Week Extension to File Certificate of Good Standing and they do not oppose it.

2. On May 12th, 2014 Palmer Freeman, local counsel, filed Nowak's Application for Admission *Pro Hac Vice*.

3. In support of his application, Nowak provided Freeman with a certificate of good standing from the State Bar of Texas. Later, the Clerk advised Freeman that Nowak must provide a certificate of good standing from the Texas Supreme Court.

4. Nowak requested such a certificate from the Texas Supreme Court and paid the required fee. Nowak has yet to receive the certificate, but expects to receive it any day.

5. The delay in receiving the certificate from the Texas Supreme Court is Nowak's fault, and his fault only.

6. Plaintiff has given defendant an extension to answer the Original Complaint.

7. On July 22, 2014, the Court ordered that Nowak's motion to appear *pro hac vice* be supplemented with the certificate of good standing from the Texas Supreme Court by July 25, 2014.

8. The affidavit of Vincent E. Nowak in support of this request is attached.

Wherefore, Plaintiff respectfully requests that the Court grant a two week extension to allow Nowak to file the certificate of good standing. Should the Court be inclined to grant this request, a proposed order has been prepared.

Respectfully submitted,

/s/ Palmer Freeman

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Columbia, South Carolina

July 25, 2014

CERTIFICATE OF CONFERENCE

Vincent E Nowak certifies that he has conferred with opposing counsel, Carol B. Ervin, and that she is not opposed to Plaintiff's Unopposed Motion for Two Week Extension to File Certificate of Good Standing.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served via Email on July 25, 2014 to opposing counsel, as follows:

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